

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

VIVIAN BERT, et al. : Case No. C-1-02-467
Plaintiffs, :
v. : Judge Beckwith
AK STEEL CORPORATION : Magistrate Judge Hogan
Defendant. : SECOND DECLARATION OF
 :
 JESSICA MORRIS

Jessica Morris truthfully declares that she is competent to testify if called and she further truthfully states of her own personal knowledge as follows.

1. I am currently employed by AK Steel Corporation as a Senior Labor Relations Representative at the Middletown Works. From January 2, 2001 to September 30, 2004, I worked as a human resources representative at the Middletown Works. I submitted an earlier declaration in this matter dated May 16, 2007.

2. As a human resources representative at the Middletown Works, I processed the hiring of hourly bargaining unit employees.

3. The last application that AK Steel received from Vivian Bert was in May 2001. AK Steel has no record of receiving applications from Bert in April or May 2002. Both the Ohio Department of Job and Family Services and AK Steel screened out applications where the applicant had previously worked for Armco or AK Steel. Even had Bert applied in April

2002 or May 2002, as she now claims, she would have again been screened out due to her previous employment with Armco.

4. AK Steel has no record of receiving an application from Edward James Lewis in November 2001.

5. AK Steel did receive an application from Edward James Lewis dated April 2001. At that time I did not know that Lewis does not have a high school diploma or a GED. He falsely stated on his application that he did. Had he completed his application honestly he would have been screened out in the initial screening process. We would have caught this during the interview or the background check, at which point he would have been removed from the process because he did not have a GED or high school diploma and because he had falsified his application. We did not hire applicants who falsified their applications.

6. Michael Miller passed the initial screening process. I did not know that he had prior criminal convictions. On September 18, 2001, Miller took and passed the pre-employment exam. I called him in for an interview on October 3, 2001. I told Miller at the interview that the next step was a background check. Miller's background check revealed that he had eight points on his driving record, his license had been suspended and he had been caught driving with a suspended license. AK Steel did not hire Miller based on the results of the background check.

7. AK Steel has no record of receiving applications from Michael Miller in June 2001 or January 2002.

I declare under penalty of perjury that the foregoing is true and accurate.

Signed this 11 day of January 2008.



Jessica Morris